

Ramzi Abadou (SBN 222567)  
KAHN SWICK & FOTI, LLP  
912 Cole Street, # 251  
San Francisco, California 94117  
Telephone: (415) 459-6900  
Facsimile: (504) 455-1498  
[ramzi.abadou@ksfcounsel.com](mailto:ramzi.abadou@ksfcounsel.com)

*Counsel for Movant Bridgestone  
Investment Corporation Limited  
and Proposed Lead Counsel for the Class*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE TESLA INC. SECURITIES  
LITIGATION ) Judge: Hon. Edward M. Chen  
 ) Date: May 2, 2019  
 ) Time: 1:30 PM  
 ) Courtroom: Courtroom 5 – 17<sup>th</sup> Floor  
 )  
 )  
 )

DECLARATION OF RAMZI ABADOU IN SUPPORT OF BRIDGESTONE INVESTMENT  
CORPORATION LIMITED'S NOTICE OF MOTION AND MOTION TO STAY PROCEEDINGS  
PENDING RESOLUTION OF PETITION FOR WRIT OF MANDAMUS BY THE UNITED  
STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

1 I, Ramzi Abadou, hereby declare as follows:

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3 1. I am a member in good standing of the bar of the State of California and am admitted to this

4 District.

5 2. I submit this Declaration, together with the attached exhibits, in support of Bridgestone

6 Investment Corporation Limited's Notice of Motion and Motion to Stay. I am fully familiar

7 with the facts stated herein.

8 3. Attached hereto as "Exhibit A" is a true and correct copy of the March 22, 2019 order from

9 the United States Court of Appeals for the Ninth Circuit, captioned *In re: Bridgestone*

10 *Investment Corporation Limited*, No. 19-70031 (9th Cir.).

11 4. Attached hereto as "Exhibit B" is a true and correct copy of the February 24, 2009 stay order

12 captioned *In re Nvidia Corporation Securities Litigation*, No. 3:08-cv-04260-RS (N.D. Cal.).

13 I declare under the penalty of perjury under the laws of the United States of America that the foregoing

14 facts are true and correct.

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16 Executed on Friday, March 22, 2019, in San Francisco, California.

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/s/ Ramzi Abadou  
RAMZI ABADOU